

UNITED STATES DISTRICT COURT
 for the
Eastern District of Michigan

United States of America

v.

Brandi Renee Randall

Case No.

Case: 2:21-mj-30379
 Assigned To : Unassigned
 Assign. Date : 8/5/2021
 SEALED MATTER (LH)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 2/7/20 to 1/26/21 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 1349	Conspiracy to Commit Wire Fraud

This criminal complaint is based on these facts:

Continued on the attached sheet.



Complainant's signature

Jeffrey Weiland- Special Agent

Printed name and title

Sworn to before me and signed in my presence
 and/or by reliable electronic means.

Date: August 5, 2021

City and state: Detroit, MI



Judge's signature

Elizabeth A. Stafford- U.S Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Jeffrey Weiland, being duly sworn, states as follows:

YOUR AFFIANT'S BACKGROUND, TRAINING AND EXPERIENCE

1. I am a Special Agent with the Federal Bureau of Investigation (FBI), and have been so employed since September 2007. I am currently assigned to the Public Corruption and Government Fraud squad in the Detroit Division of the FBI. As a Special Agent, I have investigated crimes including the corruption of state and local officials, arson, forced labor trafficking, racketeering and violations of the Foreign Agents Registration Act. During these investigations, I have been the affiant on search warrants for businesses, residences and electronic mail (e-mail) accounts. I have also conducted investigations using consensual recordings, undercover operations, Title III wiretaps and techniques authorized under the Foreign Intelligence Surveillance Act (FISA).

PURPOSE OF AFFIDAVIT

2. This affidavit is submitted in support of a criminal complaint for Brandi Renee RANDALL, date of birth XX/XX/1986, for violating 18 U.S.C. § 1349 (Conspiracy to Commit Wire Fraud). Based on the facts set forth in this affidavit, there is probable cause to believe that RANDALL conspired, or agreed, to commit the crime of wire fraud, and other federal crimes, with Sharodney

Marteze Harrison (“Sharodney”). Furthermore, RANDALL knowingly and voluntarily joined the conspiracy.

3. The information contained in this affidavit is based upon my personal knowledge obtained through participating in this investigation as well as information I received from the Michigan Unemployment Insurance Agency (MUIA), U.S. Department of Labor, Federal Grand Jury subpoenas, court orders issued pursuant to 18 U.S.C. § 2703(d), search warrants and interviews.

4. Since this affidavit is being submitted for the limited purpose of establishing probable cause that RANDALL violated 18 U.S.C. § 1349 (Conspiracy to Commit Wire Fraud), I have not included each and every fact known to me concerning this investigation.

BACKGROUND ON INVESTIGATION

5. The FBI and Department of Labor-Office of Inspector General (DOL-OIG) are investigating RANDALL, Sharodney and other individuals known and unknown for defrauding the State of Michigan and other states out of federal dollars earmarked for Pandemic Unemployment Assistance (PUA). The investigation began with a focus on more than one hundred claims for Unemployment Insurance (UI) that had been filed with the State of Michigan from two Internet Protocol (IP) addresses - 68.34.90.152, assigned to XX46 Quinn

Street Lowr, Detroit, Michigan 48234 and 68.42.157.111 assigned to XX203 Steel Street, Detroit, Michigan 48235. Sharodney resides at XX46 Quinn Street.

6. On January 26, 2021, agents from the FBI and DOL-OIG executed search warrants at XX46 Quinn Street and XX203 Steel Street. Agents found paper and electronic evidence of UI fraud at both locations, including text messages between RANDALL and Sharodney in furtherance of their conspiracy to commit wire fraud. On January 26, 2021, agents also interviewed RANDALL and other persons believed to have knowledge of the fraud scheme.

PROBABLE CAUSE

A. Background on Unemployment Insurance Program

7. The Social Security Act of 1935 initiated the federal and state UI system. The system provides benefits to individuals who are unemployed for reasons beyond their control. The purpose of the UI system is twofold: first, to lessen the effects of unemployment through cash payments made directly to laid-off workers, and second, to ensure that life necessities are met on a weekly basis while the worker seeks employment. In Michigan, the UI system is administered by the MUIA, which is part of the Michigan's Department of Labor and Economic Opportunity. Other States administer their UI programs through similar state run agencies. Regardless of state, the U.S. Department of Labor funds each of the

respective state agency's administrative costs, including salaries, office expenses, and computer equipment.

8. State unemployment systems and benefits are largely financed by taxes on private employers located in that state. When state unemployment benefits are exhausted, they may be supplemented by federal funds appropriated by the U.S. Department of Labor. As of the time of this application, the federal government is providing significant supplemental benefits to the states as a result of the COVID-19 pandemic.

9. Beginning in or about March 2020 and continuing through the present, the Families First Coronavirus Response Act (FFCRA); Coronavirus Aid, Relief, and Economic Security (CARES) Act; and American Rescue Plan Act of 2021 (ARPA) have created federal programs that allowed for the significant outlay of federal funds flowing to and through the states to offset the historic needs for unemployment benefits by the American workforce, including the State of Michigan and in the Eastern District of Michigan. Collective, these benefits are often referred to as Pandemic Unemployment Assistance (PUA).

10. Normally, in the absence of fraud, an unemployed worker initiates an UI claim in person, over the telephone, or on the Internet. Currently, the overwhelming majority of UI claims are filed online through a state website. In

order to be eligible for UI benefits, the worker must demonstrate a certain level of earnings in several quarters immediately preceding the application. The amount of unemployment benefits that a UI claimant might be eligible for depends on a variety of factors, including but not limited to the length of his or her previous employment and the amount of wages he or she earned.

11. The state agency will either approve or reject a UI claim based on the application made by the unemployed worker. If the state agency approves a UI claim, the claimant is required to re-certify the claim via telephone or Internet at various times during the life of the claim. The worker must also certify that he or she is still unemployed and actively seeking work. One way in which unemployment benefits are provided to a claimant is through the use of a debit card, issued by the Bank of America (BOA) in Michigan, which is mailed to the claimant through the U.S. Postal Service. The unemployment benefits are loaded onto the debit card electronically. Alternatively, a worker can provide the state agency with a bank routing number and bank account in which to have their unemployment benefits directly deposited electronically. In either case, additional benefits are loaded electronically at intervals thereafter. The Bank of America centers used to process Michigan's UI claims are located in Virginia and Texas.

12. In an effort to prevent and otherwise inhibit fraud, the state agencies

capture certain data surrounding the interaction between an individual and the UI system. Each time a claim is accessed in the system, it creates a digital footprint of sorts. Although states utilize their own unique systems, many times the data that is collected includes the dates, times, Internet Protocol (IP) address, and Media Access Control (MAC) address associated with a device accessing a claim. The state systems tie this information to the user-entered information captured to facilitate the claim (i.e. name, address, social security number, BOA or other bank account numbers, bank routing numbers, etc.). It is through the analysis of this data that the state agencies and investigating agents can identify fraudulent trends and tendencies associated with certain claims.

B. Search Warrants Executed at XX46 Quinn Street and XX203 Steel Street

13. On January 26, 2021, the FBI and DOL-OIG executed search warrants at XX46 Quinn Street and XX203 Steel Street. Agents found paper and electronic evidence of UI fraud at XX203 Steel Street. At XX46 Quinn Street, Agents seized debit cards and UI claims information in the name of more than twenty-five people. Agents also seized four cellular telephones and a laptop computer. During a voluntary interview with agents, Sharodney admitted a number of facts regarding his scheme to file false UI claims. Sharodney admitted that he used people's

personal information to file claims without their knowledge or consent. Sharodney admitted that he paid people to have UI claims and debit cards sent to their homes. Sharodney, however, would not identify other participants in the scheme.

14. Evidence collected in this investigation, including text messages found on Sharodney's cellular telephones, shows that in order to facilitate and conceal the UI fraud, Sharodney worked with other individuals including RANDALL. Among the actions taken by those individuals to further the goals of the conspiracy were: (1) creating e-mail accounts to link with UI claims, (2) submitting UI claims, (3) re-certifying the UI claims, (4) using their telephone numbers to verify identity, (5) creating online bank accounts in which the UI benefits were deposited, (6) collecting mail for the UI claims and (7) collecting mail with pre-paid cards on which UI benefits had been deposited.

C. Brandi Renee RANDALL

15. Agents reviewed three of Sharodney's cellular telephones seized from XX46 Quinn Street. Sharodney had messages on his cellphones from telephone numbers 313-XXX-6639 and 313-XXX-9881. In his contacts, Sharodney identified 313-XXX-6639 and 313-XXX-9881 as belonging to Brandi. During a voluntary interview on January 26, 2021, RANDALL stated that she has used both telephone numbers 313-XXX-6639 and 313-XXX-9881.

16. On 02/07/2020, RANDALL and Sharodney exchanged text messages:

Sharodney: [RS] an [LS] I'm waiting on mail to cum for them plz get mail

Brandi: Ight

Michigan UI claims in the names of [RS] and [LS] listed 20146 Wexford Street, Detroit, Michigan as the claimant's mailing address. The Michigan UI claims were filed from IP address 68.34.90.152, which was assigned to Sharodney's residence at XX46 Quinn Street. An Arizona UI claim in the name of [LS] also listed 20146 Wexford Street, Detroit, Michigan. I believe Sharodney filed fraudulent UI claims in the names of [RS] and [LS]. I believe RANDALL knew that the claims were fraudulent when she agreed to accept the mailings at her address.

17. On 02/10/2020, RANDALL and Sharodney exchanged text messages:

Brandi: [BD] and [JW]...u know them

Sharodney: Yea dem cards no goof u can trach them just waiting on them other names

Brandi: Ight

I believe that RANDALL is asking if Sharodney knows [BD] and [JW] because she received UI documents and debit cards in those names. I believe the UI claims in those names had been rejected so Sharodney told RANDALL to

throw away the cards. Sharodney, however, still wanted RANDALL to look out for the other names – [LS] and [RS].

18. On 02/14/2020, RANDALL and Sharodney exchanged text messages:

Brandi: [first name of LS] here

Sharodney: who that

Brandi: Your card

Sharodney: Ok bet it's one more cumin

I believe Sharodney was initially confused when Brandi wrote that [L] was here. [L] is the first name of [LS]. I believe the card is a debit card containing UI benefits for [LS]. Sharodney then told RANDALL that one more card was coming. I believe Sharodney was referring to a debit card for [RS].

19. On 02/29/2020, RANDALL and Sharodney exchanged text messages:

Sharodney: still waiting on mail let me kno if any mail come for them names plz that's the only way we might see sum money any letter I might got verify people identity

Brandi: Ok...he haven't came yet...I'm on the mail everyday

Sharodney: Ok

Sharodney was reminding RANDALL that if she wanted her share of the money from the fraudulent UI claims that she needed to let him know which letters came in the mail so they could take the next steps to ensure payment of the UI

claims.

20. On 05/26/2020, RANDALL and Sharodney exchanged text messages:

Brandi: card here

Sharodney: Wat card

Sharodney: Which one

Brandi: My dad

Sharodney: Ok activate it

Sharodney: Send me the information on it

Brandi: [two images of Green Dot account # XXXXXXXX0731]

I believe that RANDALL set up the Green Dot account for Sharodney to deposit the funds from fraudulent UI claims. The card may be in her father's name, and if so, it is to help RANDALL and Sharodney conceal their role in the fraud.

21. On 06/16/2020, RANDALL and Sharodney exchanged text messages:

Brandi: [image of letter from Arizona's Department of Economic Security addressed to [LC], XX146 Wexford Street, Detroit, MI 48234]

Sharodney: Yep

Sharodney: Imma be over there

Sharodney: Outside

Michigan and Arizona UI claims in the name of [LC] listed 20146 Wexford Street, Detroit, Michigan as the claimant's mailing address. Both claims were filed

from IP address 68.34.90.152, assigned to Sharodney's residence. I believe these were fraudulent claims and filed without [LC]'s knowledge or consent.

22. On 06/20/2020, RANDALL and Sharodney exchanged text messages:

Brandi: [image of letters from Arizona's Department of Economic Security addressed to [LS], [AT], and [EM] at XX146 Wexford Street, Detroit, MI 48234]

Sharodney: Bingo hold dem thangs

Arizona UI claims in the names of [LS], [AT], and [EM] were all filed on 06/11/2020 and listed 20146 Wexford Street, Detroit, Michigan as the claimant's mailing address. All three claims were filed from IP address 68.34.90.152, assigned to Sharodney's residence.

23. On 06/26/2020, Sharodney texted RANDALL "I got cards cumin from Pennsylvania be on ur box plz." On 06/26/2020, UI claims were filed in Pennsylvania in the names of [DR], [LS], [AT], and [EM] – all four names had also been used on Arizona claims sent to XX146 Wexford Street, Detroit, MI.

24. On 01/22/2021, Sharodney texted RANDALL "Any letter u get from the unemployment for the state of Michigan I need them."

25. On 01/24/2021, Sharodney texted RANDALL "Be looking out for net spend cards."

Netspend is a prepaid card similar to Green Dot accounts. In executing the

UI fraud scheme, Sharodney regularly deposited funds from fraudulent UI claims onto prepaid cards.

26. During her 01/26/2021 interview, RANDALL stated that she was not aware of Sharodney committing UI fraud. RANDALL did not tell agents about any of the UI letters that were mailed to XX146 Wexford Street.

27. Forty-four UI claims filed between 03/14/2020 and 08/07/2020 listed XX146 Wexford Street, Detroit, MI as the claimant's mailing address. The claims were filed in Michigan, Texas, Washington, Arizona and California.

28. As to claims filed with the State of Michigan and California, all payments are processed through Bank of America centers located in Virginia and Texas. It is believed that the servers used to process UI claims in Texas, Washington and Arizona are not located in Michigan. Thus, when receiving payments on Michigan UI claims and when filing claims in other states, I believe that RANDALL or Sharodney used wire communications or caused another to use wire communications in interstate commerce in furtherance of the scheme.

CONCLUSION

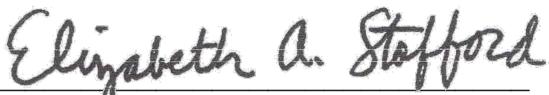
29. Based on the foregoing information, there is probable cause to believe that RANDALL conspired, or agreed, to commit the crime of wire fraud and that RANDALL knowingly and voluntarily joined the conspiracy. Therefore, there is

probable cause to believe that RANDALL violated 18 U.S.C. § 1349 (Conspiracy to Commit Wire Fraud).



Special Agent Jeffrey Weiland
Federal Bureau of Investigation

Subscribed and sworn to before me
or by reliable electronic means
this 5th day of August, 2021:



Elizabeth A. Stafford
Elizabeth A. Stafford
United States Magistrate Judge